

EXHIBIT 3

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Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER, LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**DECLARATION OF ADAM
DANIELS**

Complaint Filed: May 31, 2024
Trial Date: August 18, 2025

1 limited liability company and DOES 1
through 100, inclusive,

2 Defendants.

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4 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
5 Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
6 California limited liability company; GK
CAPITAL GROUP, LLC, a California
7 limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
8 company; and GUY KOREN, an individual,

9 Counter-Claimants,

10 v.

11 SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

12 Counter Defendant.

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14 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
15 Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
16 California limited liability company; GK
CAPITAL GROUP, LLC, a California
17 limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
18 company; and GUY KOREN, an individual,

19 Third Party Plaintiffs,

20 v.

21 PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
22 INTERNATIONAL USA, INC., a California
corporation; CINCO CORPORATION, a
23 Philippines corporation; and ROES 1 through
10, inclusive,

24 Third Party Defendants.
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DECLARATION OF ADAM DANIELS

I, Adam Daniels, declare as follows:

1. I am a partner at Polsinelli LLP. I have personal knowledge of the facts set forth in this declaration, and if called upon to testify under oath, I could and would testify competently thereto.

2. Mr. Todd Malynn is a former colleague of mine from Polsinelli LLP (“Polsinelli”). I have known Mr. Malynn since I began working as an associate in the Intellectual Property (“IP”) group at Polsinelli in 2016, where Mr. Malynn was a partner and one of my mentors.

3. During Mr. Malynn’s tenure at Polsinelli, I have had the privilege of working closely with him on numerous trademark and patent litigations, where he served as lead counsel.

4. During that time, I observed Mr. Malynn regularly in both professional and interpersonal contexts.

5. In my experience, Mr. Malynn has always conducted himself with honesty, integrity, and professionalism. Mr. Malynn treated colleagues, clients, and opposing counsel with respect and consistently demonstrated a strong commitment to ethical conduct and the rule of law.

6. In my opinion, beyond his professional skills, I have found Mr. Malynn to be a person of sound moral character and good judgment. He is thoughtful, compassionate, and accountable — traits that I believe are essential to the practice of law and the trust placed in us by the public and our clients.

I declare under penalty of perjury that the foregoing is true and correct.

Executed August 04, 2025.



Adam Daniels